

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

JASON WILLIAMS,

Plaintiff,

vs.

AT&T MOBILITY LLC,

Defendant.

Case No. 5:19-cv-00475-BO

**JOINT MOTION FOR ENTRY OF  
CONSENT PROTECTIVE ORDER**

Plaintiff Jason Williams and Defendant AT&T Mobility LLC, (“the Parties”) jointly and through their respective undersigned counsel, hereby respectfully request that the Court, pursuant to Fed. R. Civ. P. 26(c) enter the proposed Joint Stipulated Protective Order submitted with this Motion (the “Proposed Order”).

In support of this Motion, the Parties show the Court that:

1. The information exchanged in this case will likely include commercially-sensitive and/or competitive information as well as other confidential information related to the Parties’ business operations and/or personal information;
2. The Parties agreed at the Rule 26(f) Discovery Planning Conference to draft a joint protective order to govern the discovery of potentially confidential information;
3. The Parties agree to the terms of the Proposed Order; and
4. Entry of the Proposed Order is likely to assist with discovery in this matter.

WHEREFORE, the Parties request that the Court consider and enter the Proposed Protective Order and grant such other and further related relief as it deems appropriate.

Respectfully submitted this 8th day of June, 2020.

For Plaintiff:

/s/ Terence S. Reynolds

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**CERTIFICATE OF SERVICE**

I hereby certify that on date set out below, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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This the 8th day of June, 2020.

/s/ Joseph Dowdy

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